

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In Re: Generations on 1 st LLC, Debtor.	Case No.: 25-30002 Chapter 11
In Re: Parkside Place LLC, Debtor.	Case No. 25-30003 Chapter 11
In re: The Ruins, LLC, Debtor.	Case No. 25-30004 Chapter 11

MOTION FOR LEAVE OF COURT TO APPEAR BY VIDEO CONFERENCE

Caren W. Stanley, counsel to Red River State Bank ("Movant"), respectively moves this Court to enter an order under Local Rule 5001-1 allowing the appearance by video conference for **Marli A. Schippers, Nooney & Solay, LLP**, Rapid City, South Dakota ("Schippers") at the hearing on Thursday, January 16, 2025 at 10:00 a.m. ("Hearing") respecting the following motions:

- Motion for Joint Administration [Doc 5],
- Motion to Reject Management Agreement [Doc 11],
- Motion for Leave to Use Cash Collateral on an Interim and Final Basis [Doc 12]
- Motion to Utilize FDIC-Insured Depository Accounts [Doc 13]

and any other matters scheduled to take place during the Hearing.

Schippers is counsel for HME Companies, LLC, which entity was appointed by Order of the South Dakota Circuit Court on October 1, 2025, to act as Receiver for Parkside Place LLC and Generations on 1st LLC.

The undersigned makes the request for Schippers to appear by video conference at the Hearing due to the expedited scheduling of the hearing and to save time and expense by not having to travel from Rapid City, South Dakota. The request to attend the Hearing by video conference will not cause any undue hardship to the parties herein.

WHEREFORE, Movant requests that Schippers be allowed to appear by video conference at the Hearing.

Dated this 10th day of January, 2025.

VOGEL LAW FIRM

BY: /s/ Caren W. Stanley
Caren W. Stanley (#06100
218 NP Avenue
PO Box 1389
Fargo, ND 58107-1389
Telephone: (701) 237-6983
Fax: (701) 476-7676
Email: cstanley@vogellaw.com
ATTORNEYS FOR RED RIVER STATE BANK